

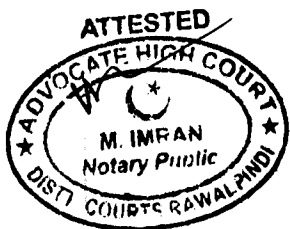
BEFORE THE ELECTION COMMISSION OF PAKISTAN  
THROUGH SECRETARY ELECTION COMMISSION,  
ISLAMABAD

REPRESENTATION / OBJECTIONS ON DELIMITATION  
IN RAWALPINDI CITY

Respectfully Sheweth:

1. That the applicant / objector is permanent resident of Rawalpindi City and registered voter for the last many decades. The applicant is former Member National Assembly from NA-55, Rawalpindi. He has also served as Deputy Mayor and councilor Rawalpindi Municipal Corporation.
2. That the applicant / objector has the following objections on preliminary report prepared for delimiting Rawalpindi City, particularly old NA-55 (New NA-62).
  - i) That before delimiting the constituency and preparing a preliminary report neither any representations were received nor inquiries were held nor public representatives were consulted nor proper course was adopted and the officials while sitting in their offices have

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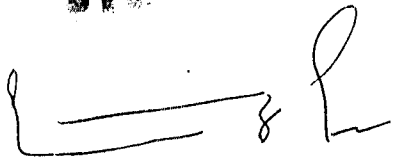
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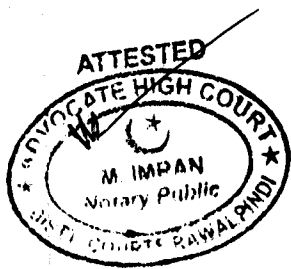
prepared a preliminary report which is absolutely unnatural, unfair and violative of provisions of Election Act, 2017.

ii). That according to section 20 of Election Act, 2017, distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies are to be considered while carrying out the delimitation. In the instant case none of these principles were taken into consideration and the constituencies have been delimited in a way which is not only alien to the principles of delimitation but also against the public convenience and natural justice.

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iii). That Rawalpindi City was earlier divided into two constituencies, NA-55 and NA-56 whereas in Cantt area there was a

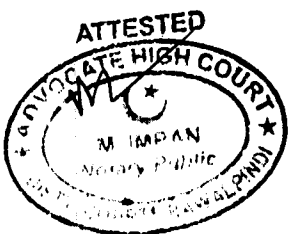


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constituency, NA-54. The said constituencies in their respective areas had been existing for the past many decades and the division / delimitation of those constituencies was natural and based on geographically compact areas with few exceptions which could have been rectified during the current delimitation by making necessary changes and keeping the old constituencies intact but quite surprisingly old constituencies have been abolished and new constituencies have been created in an unnatural, unreasonable and unfair manner. Some areas of city have been taken out from it and have been included in newly established constituency NA-61 although these areas are geographically compact with Constituency NA-62. These areas include Dhok Ratta, Dhok Hassu etc. Similarly, UC-1 to UC-16 have been taken out illegally and unreasonably from city. UC-33 to UC-46 have also been taken out

etc

*[Handwritten signature]*

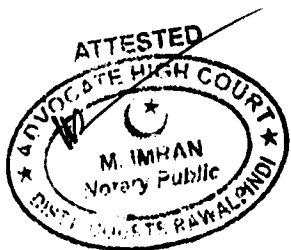
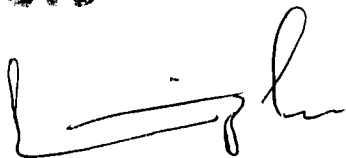


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and included in a new constituency NA-61 (old 54).

iv). That the proper course was to keep intact NA-54, NA-55 and NA-56 with slight modifications so that geographically compact areas may continue to be part of one constituency. For the said purpose, area of Gawalmandi which was earlier part of NA-56 could have been included in old NA-55 and thereafter it could have been given new number. Similarly, some areas in Rawalpindi City which were earlier part of NA-52 could have been included in old NA-56 by giving it new number. Similarly, some modifications in NA-54 could have also been made but completely abolishing the constituencies which were existing for the past many decades and establishing totally new constituencies comprising on new areas was totally unwarranted, unreasonable and unfair.

etc



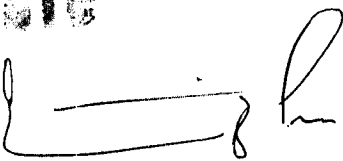
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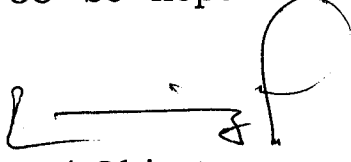
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v). That preliminary report prepared by Election Commission if allowed to continue, would create difficulties, inconvenience and complications for the public. The report is arbitrary, fanciful, capricious and against the settled principles of delimitation, therefore, is not tenable.

**PRAYER:-**

It is, therefore, respectfully submitted that objections mentioned above, be taken into consideration and the delimitation in Rawalpindi be made in the manner where the old Constituency NA-54, NA-55 and NA-56 be kept intact with some modifications and changes and by giving them the new numbers, particularly, old NA-55 be kept intact by including area of Gawal Mandi into it.

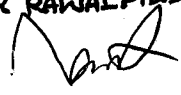
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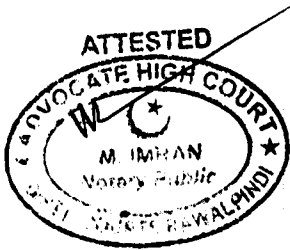


Applicant / Objector

Haji Pervaiz Khan  
Former Member National Assembly  
NA-55, Rawalpindi  
Currently Registered Voter  
NA-62, Rawalpindi  
KOHATI BAZAR RAWALPINDI

Through:





02 APR 2018

**Sardar Abdul Raziq Khan**  
Advocate Supreme Court  
8 Mall Plaza, Saddar Rawalpindi